

Renato C. Stabile
Attorney at Law
580 Broadway, Suite 400
New York, NY 10012
212-219-1469 (o)
212-219-1897 (fax)
917-204-0181 (mobile)
renato.c.stabile@gmail.com

May 29, 2020

Application denied.

BY ECF

Honorable William H. Pauley III
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

June 1, 2020

Re: *United States v. Osborne, et al., 19 Cr. 931 (WHP)*

Dear Judge Pauley:

I am the attorney for Lywan Reed, a defendant in the above-referenced matter. I write to request a temporary modification of the conditions of Mr. Reed's release. Mr. Reed is on home confinement with electronic monitoring. We request permission for Mr. Reed to leave his home on Saturday, June 6, 2020 from 5:00 pm to 11:00 pm to attend a "gender reveal" for his expected baby, who is due in September 2020. The gathering would be with family and close friends and would be limited to 10 people. It would be at a home located approximately a 10 minute drive from Mr. Reed's current residence and we would provide the address to Pretrial Services. I have communicated with both Pretrial Services and the Government about this request. Pretrial Services advised that as a general policy, Pretrial Services does not consent to any social activities. The Government advised that it defers to Pretrial.

I thank the Court for its consideration.

Respectfully submitted,

/s/

Renato C. Stabile

cc: AUSA Rebecca Dell
All Defense Counsel
(via ECF)

Bernisa Mejia
Pretrial Services
(via email)